

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**Civil Action No.: 1:19-cv-00593-LCB-JLW**

**ZION WILLIAMSON,**

**Plaintiff/Counter-  
Defendant,**

**v.**

**PRIME SPORTS MARKETING, LLC  
and GINA FORD,**

**Defendants/Counter-  
Plaintiffs.**

**JOINT MOTION TO EXTEND WORD  
LIMITS FOR DISPOSITIVE MOTION  
BRIEFING**

Plaintiff Zion Williamson and Defendants Prime Sports Marketing, LLC and Gina Ford respectfully move this Court, pursuant to Local Rule 7.3(d), to extend the word limits for the parties' memoranda in connection with their forthcoming dispositive motions, such that memoranda in support of and in opposition to the dispositive motions are permitted 9,500 words (rather than 6,250) and reply memoranda are permitted 4,700 words (rather than 3,125). In support of its motion the parties show the Court as follows:

1. Pursuant to the Court's Text Order of November 24, 2021, discovery in this matter ended on January 21, 2022, and any party intending to file a dispositive motion must file and serve notice of its intent on or before January 28, 2022.
2. Plaintiff and Defendants intend to file dispositive motions and will be filing notice of their intent later today, January 28, 2022.

3. Under Local Rule 7.3(d), memoranda in support of and in opposition to dispositive motions are permitted 6,250 words, and reply memoranda are permitted 3,125 words.

4. The parties respectfully request an increase to these word limits to fully address the voluminous record, significant number of pending counterclaims, and distinct legal issues necessary for resolution of the parties' dispositive motions.

5. The parties' Joint Rule 26(f) Report (ECF No. 59), which the Court approved in its Order dated March 15, 2021 (ECF No. 61), designated this case as "Complex."

6. Defendants have numerous currently pending counterclaims, as set forth in their Answer to Plaintiff's First Amended Complaint with Affirmative Defenses and Counterclaims Against Plaintiff (ECF No. 32), which will be the subject of the parties' respective dispositive motions.

7. The record includes more than 2,700 documents, the transcripts of six depositions, and dozens of pages of interrogatory responses.

8. To fully and adequately address the factual and legal issues necessary to resolve the parties' dispositive motions, the parties respectfully submit that they will need more than the default word limits set forth in Local Rule 7.3(d). An increase to those default word limits will provide the parties with sufficient space for a fulsome discussion of the relevant factual and legal issues and aid the Court's determination of the dispositive motions.

9. This motion is the first by any party to extend the word limits for any memoranda submitted to the Court in this matter.

**WHEREFORE**, Plaintiff and Defendants request that the Court extend the word limits for the parties' memoranda on their forthcoming dispositive motions, such that memoranda in support of and in opposition to the motions are permitted 9,500 words and reply memoranda in support of the motions are permitted 4,700 words.

*[Signatures Follow]*

Dated: January 28, 2021

/s/ John R. Wester

---

John R. Wester  
N.C. Bar No. 4660  
jwester@robinsonbradshaw.com

Robert E. Harrington  
N.C. Bar No. 26967  
rharrington@robinsonbradshaw.com

Fitz E. Barringer  
N.C. Bar No. 42679  
fbarringer@robinsonbradshaw.com

**Robinson, Bradshaw & Hinson, P.A.**  
101 North Tryon Street, Suite 1900  
Charlotte, North Carolina 28246  
Telephone: (704) 377-2536  
Facsimile: (704) 378-4000

Jeffrey S. Klein\*  
jklein@cgr-law.com

CLARICK GUERON REISBAUM LLC  
220 Fifth Avenue, 14<sup>th</sup> Floor  
New York, New York 10001  
Telephone: (646) 398-5071

Zachary D. Tripp\*  
zack.tripp@weil.com

WEIL, GOTSHAL & MANGES LLP  
2001 M Street NW, Suite 600  
Washington, D.C. 20036  
Telephone: (202) 682-7220

Lauren E. Richards\*  
lauren.richards@weil.com

Zachary Schreiber\*  
zach.schreiber@weil.com

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153-0119  
Telephone: (212) 310-8591

Edward Soto\*  
edward.soto@weil.com

Pravin R. Patel\*  
pravin.patel@weil.com

WEIL, GOTSHAL & MANGES LLP  
1395 Brickell Avenue, Suite 1200  
Miami, Florida 33131  
Telephone: (305) 577-3177

\* Local Rule 83.1(d) Special Appearance

*Attorneys for Plaintiff/Counter-Defendant*

/s/ Willie E. Gary

Willie E. Gary, Esq.  
Gary, Williams, Parenti, Watson  
& Gary, PLLC  
221 E. Osceola Street  
Stuart, Florida 34994  
(772) 283-8260  
[weg@williegary.com](mailto:weg@williegary.com)  
*\*Local Rule 83.1(d) Special Appearance*

/s/ Alvin L. Pittman

ALVIN L. PITTMAN, ESQ. (N.C. Bar No. 8460)  
[office@apittman-law.com](mailto:office@apittman-law.com)  
Law Offices of Alvin L. Pittman  
Airport Center Building  
5901 W Century Boulevard, Suite 412  
Los Angeles, California 90045  
(310) 337-3077  
(310) 337-3080 (fax)

/s/ Stephen L. Drummond

Stephen L. Drummond\*  
[sdrummond@dswinlaw.com](mailto:sdrummond@dswinlaw.com)  
DRUMMOND & SQUILLACE, PLLC  
175-61 Hillside Avenue, Suite 205  
Jamaica, New York 11432  
Tel: (718) 298-5050  
Fax: (718) 298-5554  
*\*Local Rule 83.1(d) Special Appearance*

/s/ JoAnn Squillace

JoAnn Squillace\*  
[jsquillace@dswinlaw.com](mailto:jsquillace@dswinlaw.com)  
DRUMMOND & SQUILLACE, PLLC  
175-61 Hillside Avenue, Suite 205  
Jamaica, New York 11432  
Tel: (718) 298-5050  
Fax: (718) 298-5554  
*\*Local Rule 83.1(d) Special Appearance*

*Attorneys for Defendants/Counter-Plaintiffs  
Prime Sports Marketing, LLC and Gina Ford*